JACKSON, COOK, CARACAPPA & SCOTT, P.C.

By: Joseph M. Ramagli, Esquire Attorney I.D. No. 313772 312 Oxford Valley Road Fairless Hills, PA 19030 (215) 946-4342

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Sherry Lee Shire-Misnik, : Case No. 17-18533-amc

:

Debtor : Chapter 13

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NOTICE OF PRESENTATION OF MOTION TO AVOID JUDICIAL LIEN

PLEASE TAKE NOTICE that upon the annexed Motion, the undersigned will present the attached proposed order to the Honorable Ashely M. Chan, United States Bankruptcy Judge, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 214, Philadelphia, PA 19107 for signature on June 12, 2018 at 11:00 a.m.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to (1) the Bankruptcy Judge's chambers, and (2) the undersigned by the presentment date and time, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court or Debtor will notice the objecting parties of the date and time of the hearing and of the Debtor's obligation to notify all parties entitled to receive notice. The Debtor and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Date: May 10, 2018 By: /s/ Joseph M. Ramagli

Joseph M. Ramagli, Esquire Attorney for Debtor